

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting, et al.,

*Defendants*

Civil Action No. 23 CV 1057

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NORTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina  
Senate, et al.,

*Defendants.*

Civil Action No. 23 CV 1104

**SUPPLEMENTAL JOINT STIPULATED FACTS**

1. The following joint stipulated facts supplement those filed by the parties in June of 2025, *see* Doc. 148 (First Amended Joint Stipulated Facts), to address subsequent events related to the passage of Senate Bill 249 (S.L. 2025-95) (“S.B. 249”).

*2025 Trial Challenging the 2023 Congressional Plan*

2. In June and July of 2025, this Court presided over a full trial on the merits of Plaintiffs’ claims challenging the 2023 Congressional Plan.

3. Post-trial briefing on the 2023 Congressional Plan challenge was completed on August 5, 2025.

*2025 Redistricting Process*

4. On October 20, 2025, Senator Hise introduced S.B. 249 in the Senate Standing Committee on Elections (hereinafter the “Senate Elections Committee”). Along with S.B. 249, Senator Hise presented the 2025 Congressional Plan Criteria he stated were used to draw the congressional plan contained in S.B. 249. A true and accurate copy of the “2025 Congressional Plan Criteria” is provided at Doc. 184-10 (Klein Ex. 9).

5. On October 20, shortly after 10:00am, the Senate Elections Committee met to discuss the proposed S.B. 249. A true and accurate copy of the audio recording of this meeting is provided at Doc. 184-11 (Klein Ex. 10) and a true and accurate copy of the video recording is available on the North Carolina General Assembly’s YouTube channel at <https://www.youtube.com/watch?v=67p7bbT8EYw>. A true and accurate copy of the transcript of this meeting is appended as Exhibit A to these Supplemental Stipulated Facts.

6. At the end of the meeting, the Senate Elections Committee voted in favor of S.B. 249.

7. On October 20, 2025, S.B. 249 proceeded to the Senate floor for consideration. A true and accurate copy of the audio recording of the Senate Session is provided at Doc. 184-12 (Klein Ex. 11). A true and accurate copy of the transcript of this meeting is appended as Exhibit B to these Supplemental Stipulated Facts.

8. The Senate took up S.B. 249 for its third reading vote the next morning, on Tuesday, October 21, 2025. A true and accurate copy of the audio recording of this Senate Session is provided at Doc. 184-14 (Klein Ex. 13). A true and accurate copy of the transcript of this meeting is appended as Exhibit C to these Supplemental Stipulated Facts.

9. The bill next moved to the House Select Committee on Redistricting, where it was considered on Tuesday, October 21, 2025. A true and accurate copy of the audio recording is provided at Doc. 184-16 (Klein Ex. 15), and a true and accurate copy of the video recording is available on the North Carolina General Assembly's YouTube channel at <https://www.youtube.com/watch?v=BX4SuqW0b5s>. A true and accurate copy of the transcript of this meeting is appended as Exhibit D to these Supplemental Stipulated Facts.

10. The bill was placed on the House Floor calendar for the next day, October 22, 2025. A true and accurate copy of the audio recording of this meeting is provided at Doc. 184-18 (Klein Ex. 17), and a true and accurate copy of the video recording available on the North Carolina General Assembly's YouTube channel at [https://www.youtube.com/watch?v=JW2v\\_F1tZ0U](https://www.youtube.com/watch?v=JW2v_F1tZ0U). A true and accurate copy of the transcript of this meeting is appended as Exhibit E to these Supplemental Stipulated Facts.

*The 2025 Amendment to Congressional Districts 1 and 3*

11. S.B. 249 became law on October 22, 2025. S.B. 249 amended Section 163-201(a) of the North Carolina General Statutes to change the configurations of Congressional Districts 1 and 3. No other changes to the 2023 Congressional Plan were introduced by S.B. 249.

*Defendants*

12. Defendants Senator Warren Daniel, Senator Ralph E. Hise, Jr., Senator Brad Overcash, Speaker Destin Hall, President pro *tempore* Philip E. Berger, North Carolina State Board of Elections Executive Director Sam Hayes, North Carolina State Board of Elections Chair Francis X. De Luca, and North Carolina State Board of Elections Member Robert Rucho all maintain the same titles and roles as stipulated in Doc. 148, and are all sued in their official capacities only.

13. Defendant Hugh Blackwell is sued in his official capacity as the co-chair of the House Select Committee on Redistricting.

*Additional Joint Stipulations*

14. The parties agree that the Court may consider expert reports and witness declarations submitted in support of or in opposition to Plaintiffs' motions for preliminary injunction regardless of whether that witness or expert testifies at the November 19, 2025, preliminary injunction hearing.

15. The parties agree that any documentary evidence presented during the November 19, 2025, preliminary injunction hearing will be limited to: (1) documents and transcription of any testimony already admitted on the trial record; and (2) materials filed

with the preliminary injunction papers on the deadlines set by the Court, and (3) any documents and recordings from the legislative record of S.B. 249 from the ncleg.gov website. The parties agree that they may ask the Court to consider documents deemed appropriate for judicial notice and/or statements by a party-opponent subject to objections by other parties.

Respectfully submitted this, the 18th day of November, 2025.

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